

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEPHEN SULLIVAN, WHITE OAK FUND LP,
CALIFORNIA STATE TEACHERS' RETIREMENT
SYSTEM, SONTERRA CAPITAL MASTER FUND,
LTD., FRONTPOINT PARTNERS TRADING
FUND, L.P., AND FRONTPOINT AUSTRALIAN
OPPORTUNITIES TRUST on behalf of themselves
and all others similarly situated,

Plaintiffs,

– against –

BARCLAYS PLC, BARCLAYS BANK PLC,
BARCLAYS CAPITAL INC., BNP PARIBAS S.A.,
CITIGROUP, INC., CITIBANK, N.A.,
COÖPERATIEVE CENTRALE RAIFFEISEN-
BOERENLEENBANK B.A., CRÉDIT AGRICOLE
S.A., CRÉDIT AGRICOLE CIB, DEUTSCHE BANK
AG, DB GROUP SERVICES UK LIMITED, HSBC
HOLDINGS PLC, HSBC BANK PLC, ICAP PLC,
ICAP EUROPE LIMITED, J.P. MORGAN CHASE &
CO., CRÉDIT AGRICOLE CHASE BANK, N.A., THE
ROYAL BANK OF SCOTLAND PLC, SOCIÉTÉ
GÉNÉRALE SA, UBS AG AND JOHN DOE NOS. 1-
50,

Defendants

Docket No.: 13-cv-02811 (PKC)

**PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT WITH DEFENDANTS CRÉDIT AGRICOLE S.A. AND
CRÉDIT AGRICOLE CIB, SCHEDULING HEARING FOR FINAL APPROVAL
THEREOF AND APPROVAL OF THE PROPOSED FORM AND PROGRAM OF
NOTICE TO THE SETTLEMENT CLASS**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Joint Declaration of Vincent Briganti and Christopher Lovell dated April 29, 2022 and the exhibits attached thereto, including the Settlement Agreement, and the record herein, Plaintiffs Stephen Sullivan, on behalf of himself and all others similarly situated, White Oak Fund LP, FrontPoint Partners Trading Fund, L.P., FrontPoint Australian Opportunities Trust, Sonterra Capital Master Fund, LTD., and the California State Teachers' Retirement System (collectively, "Plaintiffs"), by and through their undersigned counsel, will respectfully move this Court, before the Honorable P. Kevin Castel, United States District Judge, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York at a date and time to be determined by this Court, for an order granting Plaintiffs' motion for preliminary approval of the settlement with Defendants Crédit Agricole S.A. and Crédit Agricole CIB and for such other relief as set forth in the proposed order filed herewith.

Dated: April 29, 2022
White Plains, New York

LOWEY DANNENBERG, P.C.

/s/ Vincent Briganti
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